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3 THE HONORABLE ROBERT S. LASNIK  
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6 UNITED STATES DISTRICT COURT,  
7 WESTERN DISTRICT OF WASHINGTON, AT TACOMA

8 ANN and MUHAMMAD CHAUDHRY,  
9 Plaintiffs,  
10 v.  
11 AMERICAN FAMILY MUTUAL  
12 INSURANCE COMPANY, A FOREIGN  
13 INSURER,  
14 Defendant.

NO. 3:20-cv-06005-RSL  
NOTICE OF CLAIM OF LIEN

15 Comes now Matthew B. Edwards and Owens Davies, P.S., and provides notice of its  
16 intent to claim a lien against this action, any judgment in this action, and any proceeds payable or  
17 due to the Chaudhrays in the hands of adverse parties in this action, to secure our claim for  
18 payment for amounts that may be due to us arising out of our representation of and/or the special  
19 agreement we entered into with the Chaudhrays.

20 DATED this 15<sup>th</sup> day of January, 2021.

21 OWENS DAVIES, P.S.  
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23 /s/ Matthew B. Edwards  
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Chaudhry

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Declaration of Matthew B. Edwards in Support of Notice of Claim of Lien

1. My name is Matthew B. Edwards. I am over 18 years of age and competent to testify as to all matters set forth herein. I and my law firm, Owens Davies, P.S., were formerly counsel of record for the Plaintiffs, Ann and Muhammad Chaudhry, in this matter.

2. I and my law firm agreed to represent the Chaudhrys under a special agreement.

3. I and my law firm have to date not been paid any sums for the work performed for the Chaudhrays in this matter, whether pursuant to that special agreement or otherwise.

4. Effective January 5, 2021, the Court authorized Owens Davies, P.S.'s withdrawal as counsel of record in this matter, and authorized Pfau Cochran Vertetis Amala, PLLC's substitution as counsel of record in its place.

5. I and Owens Davies, P.S. hereby provide notice that we claim a lien, under Chapter 60.40 RCW, against this action, any judgment in this action, and any proceeds payable or due to the Chaudhrays in the hands of the adverse parties in this action, to secure our claim for payment for any amounts that may be due to us arising out of our representation of and/or the special agreement entered into with the Chaudhrays.

I declare under penalty of perjury of the laws of the State of Washington that the foregoing statement is true and correct.

/s/ Matthew B. Edwards

Matthew B. Edwards

NOTICE OF CLAIM OF LIEN (3:20-cv-06005-RSL)- 2 -

**OWENS DAVIES, P.S.**  
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Phone: (360) 943-8320  
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